

AO 91 (Rev. 11/11) Criminal Complaint

Inspector:

AUSA: Erin Ramamurthy

Justin Woodard (USPS)

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jeffrey WELSH

Case:2:19-mj-30635

Judge: Unassigned,

Filed: 12-05-2019 At 11:04 AM

USA v. JEFFREY WELSH(CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 30, 2019 & November 22, 2019 in the county of St. Clair in theEastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

Title 18 U.S.C. § 1342

Using a false name or address in mailings

Title 18 U.S.C. § 1716

Engaging in the mailing of injurious articles

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*

Justin Woodard, Postal Inspector, USPS

Printed name and title

Sworn to before me and signed in my presence.

Date: December 5, 2019*Judge's signature*City and state: Detroit, Michigan

Hon. Anthony P. Patti, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT AND
ARREST WARRANT**

I, Justin Woodard, being first duly sworn, do hereby state:

I. Introduction

1. I am a United States Postal Inspector employed by the United States Postal Inspection Service (USPIS) assigned to the Detroit Division. I have been so employed since June of 2017. As such, I am sworn and empowered to investigate criminal activity involving or related to the U.S. Postal Service. I have received advanced training by the USPIS in the investigation of dangerous items being transported through the U.S. Mail. I have participated in investigations involving dangerous and hazardous items being transported through the U.S. Mail. I have received considerable training related to identifying, screening, and tracking potentially harmful items in the U.S. Mail. Prior to receiving this position, Affiant completed the USPIS Basic Training Academy where investigative techniques were taught and developed. I am currently assigned to the Contraband Interdiction and Investigations Team and is responsible for investigations involving dangerous mail matter and controlled substance trafficking through the U.S. Mail.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **JEFFREY WELSH** (DOB: xx/xx/1963) for violations of 18 U.S.C. § 1342 (using a false name or address in mailings) and 18 U.S.C. § 1716 (engaging in the mailing of injurious articles).

3. The information contained in this affidavit is based on my training, experience, personal knowledge, and observations during the course of this investigation, information provided to me by other Postal Inspectors and other law enforcement officers, witnesses, and review of documents and communications with others who have personal knowledge of the events and circumstances described herein. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint, it does not set forth each and every fact that I or others have learned during the course of this investigation.

II. Investigation and Probable Cause

4. On or about October 24, 2019, Affiant received information that on or about October 22, 2019, Inspectors in Sacramento, California intercepted Priority Mail parcel 9505 5121 2503 9289 3733 06 while conducting a parcel interdiction. This parcel was intercepted due to excessive taping, a false return address, and a positive hit from a narcotics canine. The parcel was mailed October 16, 2019, from the Port Huron Post Office and was addressed to "Joe Tranvu, 720 Greenback Ln, Modesto, CA 95351," with a return address of "J. Parker, 1448 19th St, PH, MI 48060," which further investigation revealed does not exist. Inspectors contacted the recipient of the parcel, who advised the parcel may contain furniture and granted Inspectors consent to open it. The parcel contained 36 4" Crackling Nishiki

Kamuro commercial grade fireworks. The recipient then advised he ordered something off of eBay; however, eBay may have sent him the wrong package and he no longer wished to receive it. Utilizing Postal records, Sacramento Postal Inspectors identified (810) XXX-0230 as being associated with the suspicious parcel. Inspectors contacted the phone number. An unidentified male answered and stated his involvement with the parcel consisted of tracking it for a friend who was getting divorced and did not want his wife to find out.

5. In or about October 2019, Affiant obtained surveillance video footage of October 16, 2019, from the Port Huron Post Office to review the mailing of the parcel 9505 5121 2503 9289 3733 06. The video footage shows a heavy set white male presenting the suspicious parcel and four other parcels of similar size and appearance to the clerk for mailing.

6. On or about October 28, 2019, Affiant went to the Port Huron Post Office to speak with postal personnel about the suspicious parcel. Upon viewing the surveillance footage, postal personnel identified the mailer as a frequent customer, stating he mails similar parcels approximately three to four times per week primarily to Hawaii and California. Postal personnel stated the customer previously advised the contents of the parcels included crystals with a holographic image located in the center and fiber optic angels. Postal personnel provided Affiant with documentation recently submitted by the customer which identifies him as Jeffrey

WELSH, with a mailing address of 4095 Aletha Ln, Port Huron, MI 48060 and a telephone number of (810) XXX-0230. This is the same telephone number Sacramento Inspectors contacted in relation to the suspicious parcel.

7. In or about October 2019, Affiant compared the driver's license photo for WELSH on file with the Michigan Secretary of State and the surveillance footage from the Port Huon Post Office on October 16, 2019. The mailer in the video and the driver's license photo for WELSH appeared to be similar. Further, the signature on WELSH's state of Michigan driver's license, as well as the writing on the Postal documentation provided by Postal personnel, appeared to be similar to the writing on the suspicious parcel's label.

October 30, 2019 Parcels Mailed by WELSH

8. On or about October 30, 2019, WELSH visited the Port Huron Post Office and presented three parcels for mailing to different recipients in Hawaii. These parcels were similar in size and appearance to the previously identified suspicious parcel, and the return addresses on these parcels listed fictitious addresses and/or deceased individuals. On the same date, Postal personnel notified Affiant about the parcels, and affiant subsequently retrieved the parcels from the Port Huron Post Office.

9. Affiant obtained a federal search warrant for the three parcels presented by WELSH and executed the warrant on November 20, 2019. Upon opening the

parcels, Affiant found each parcel to contain fireworks. Parcel 1 contained Solar Max 100 Mortar Shots. Parcel two contained 12 three inch Nishiki Kamuro Niagara Falls Mortar Shells and four boxes of pop caps. Parcel three contained two Super Star 200 Mortar Shots.

10. On or about November 8, 2019, Inspectors in Hawaii intercepted and opened a parcel with recipient consent and found the parcel to contain some quantity of commercial grade fireworks. The parcel was mailed from the Port Huron Post Office on or about November 4, 2019 and was addressed to a residence in Hawaii. The destination address of this parcel was the same as the destination address of one of the parcels Affiant opened under the aforementioned federal search warrant.

November 22, 2019 Parcels Mailed by WELSH

111. On or about November 22, 2019, WELSH visited the Port Huron Post Office and presented two parcels for mailing to different recipients in California. These parcels were similar in size and appearance to the previously identified suspicious parcels, and the return addresses on these parcels listed the sender as T.W. at an address in Fort Gratiot, MI.

12. On or about November 25, 2019, Affiant contacted T.W. via telephone to inquire about the parcels. T.W. stated he and his wife own the Fort Gratiot residence but do not reside there; the residence is currently for sale. T.W. further stated he did not mail either parcel and had no knowledge of his name being used

as the sender of either parcel.

13. Affiant obtained a federal search warrant for the two parcels presented by WELSH and executed the warrant in or about December 3, 2019. Upon opening the parcels, Affiant found each parcel to contain 72 three-inch mortar shells.

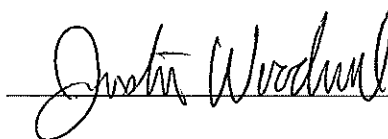
November 26, 2019 Parcel Intercepted by CBP

14. On or about November 26, 2019, U.S. Customs and Border Protection (CBP) executed a pre-border search at the International Service Center in New York, NY, of a parcel mailed from the Czech Republic to WELSH. This parcel's cargo manifest listed the contents as "Gift (Wood Toys)." Upon opening the parcel, CPB found it to contain only a quantity of commercial grade fireworks.

III. CONCLUSION

16. Based upon the information contained in this affidavit, there is probable cause to believe Jeffery WELSH has committed violations of 18 U.S.C. § 1342 (using a false name or address in mailings) and 18 U.S.C. § 1716 (engaging in the mailing of injurious articles).

Respectfully submitted,

A handwritten signature in cursive script, reading "Justin Woodard", is written over a horizontal line.

Justin Woodard
U.S. Postal Inspector

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Sworn to and subscribed before me on this 5th day of December, 2019.

ASP

HON. ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE